



GSA's

NEPA Call-In Update

WINTER 1999

NEPA Call-In is GSA's National Environmental Policy Act (NEPA) information clearinghouse and research service.

NEPA Call-In is designed to meet the NEPA compliance needs of GSA's realty professionals.

NCR Tackles Storm Water Management

The Chesapeake Bay drains freshwater from a 64,000 square-mile watershed that extends in a north south direction from Cooperstown, New York to Norfolk, Virginia. The watershed includes portions of the States of New York, Pennsylvania, Delaware, Maryland, Virginia and West Virginia, and the District of Columbia. In an effort to help further cleanup and protection goals established for the Chesapeake Bay, GSA

Administrator Barram signed the Environmental Protection Agency's (EPA) Chesapeake Bay Program initiative agreements, committing the National Capital Region (NCR), Region 2, and Region 3 to a proactive storm water management program.

The goal of such a program is to move beyond basic compliance with Federal and State storm water regulations, such as the Clean Water

Act, in an effort to restore and maintain the Chesapeake Bay and its tributaries. With control of many Federal buildings within the main program area watershed, NCR has begun to implement a program for improved storm water management under the agreements. The agreements also require Regions 2 and 3 to meet Program goals for facilities within watersheds that are connected to the Chesapeake Bay, such as the Susquehanna Watershed that

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The E-Book Nears Completion

In response to requests from the regions for environmental training, the NEPA Call-In office has been involved in the creation of The Environmental Book, or "E-Book." The "E-Book" is an interactive computer program for helping realty specialists, asset managers, and other GSA realty professionals learn about compliance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). The "E-Book" is also intended to be a useful reference tool for GSA realty personnel, guiding them on a step-by-step process through NEPA and NHPA Section 106

compliance, as it relates to specific GSA actions.

At the Environmental Quality Advisor Group (EQAG) meeting in Atlanta in September 1998, Dr. Tom King gave a presentation on

the "E-Book". Due to Tom's departure from GSA, NEPA Call-In has taken over the role of creating the "E-Book". Since September, NEPA Call-In

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FROM THE NEPA CALL-IN PROGRAM DIRECTOR

External barriers to the new GSA ADM and PBS Orders on National Environmental Policy Act (NEPA) implementation fell when Ray Clark of the Council on Environmental Policy (CEQ), [regulatory overseer of NEPA policy implementation] called with his approval of the "fabulous" GSA NEPA Desk Guide and Orders. Administrator Barram and Commissioner Peck's signing of the ADM and PBS Orders will culminate three years of a consorted, and sometimes vexing effort by the GSA Environmental Quality Advisory Group (EQAG) to write clear and easily implemented NEPA compliance documents. The EQAG, formed four years ago to advise the PBS Commissioner on environmental issues through the offices the GSA NEPA

Liaison, deserves kudos for its dedication to writing what both the CEQ and the Environmental Protection Agency have deemed a new Federal standard.

The Smithsonian Institution and the Department of Justice's Immigration and Naturalization Service (INS) are currently editing the GSA NEPA Desk Guide to correlate with their organizational structures, having found the document on the GSA NEPA Call-In world wide web site. Furthermore, it is highly complimentary that Ray Clark of the CEQ has asked for copies of the GSA NEPA Desk Guide for the CEQ's distribution to Federal agencies with its recommendation for the GSA NEPA Desk Guide serve as a model for all agencies' best practices. Upon clearance and signing by Commissioner Peck and Administrator Barram, we intend

to print and distribute 500 copies of the NEPA Desk Guide in order to meet the estimated immediate demand for the document.

The EQAG has, through its pan regional efforts, authored a tool of such intelligence and utility that the NEPA Desk Guide has received adulation and imitation prior to its official adaptation by the agency which will claim title to its intellectual property. The EQAG should appreciate that imitation is the sincerest form of flattery. Well done EQAG!

- Colin Wagner, GSA NEPA Liaison

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flows through portions of New York and Pennsylvania.

On September 9, 1998, representatives of NCR requested assistance and guidance from the GSA National Office in developing a program to address the Chesapeake Bay Program initiative agreements. This request is currently being carried out by the NEPA Call-In program staff.

The Chesapeake Bay Program

The Chesapeake Bay Program is the unique regional partnership that

has been directing and conducting the restoration of the Chesapeake Bay since the signing of the historic 1983 Chesapeake Bay Agreement. The Chesapeake Bay Program partners include the State of Maryland and Commonwealths of Pennsylvania and Virginia; the District of Columbia; the Chesapeake Bay Commission, a tri-state legislative body; the Environmental Protection Agency, representing the Federal government; and participating advisory groups. Several Federal initiatives under the Chesapeake Bay

Program have been signed by the GSA Administrator, which commits NCR, Region 2, and Region 3 to take action. **Chesapeake Bay Program Agreements and Guidance**

1. Special Tributaries Strategy for Federal Lands in the District of Columbia, signed by Administrator Barram for GSA in March 1996

This agreement's main objective is to assure that storm water pollution prevention plans for Federal

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facilities in the District of Columbia are reviewed and reflect Chesapeake Bay cleanup and protection goals related to nutrient and pesticide management. The agreement also calls for Federal storm water workgroups to facilitate information transfer and interagency cooperation.

2. Recommendations of the Special Panel on Combined Sewer Overflows and Storm water Management in the District of Columbia, September 1998

This document provides suggestions to Federal agencies to help abate the District of Columbia's combined sewer overflow (CSO) problem. The District of Columbia maintains a combined storm water and sewer system that overflows into local water bodies during certain rainfall events. This problem is an indication of the need for improved storm water management in the urban environment, where increasing amounts of pavement quickly channels storm water to the sewers. Section C of the document recommends that GSA take the following measures:

◆ Accelerate wet weather pollution prevention and control on Federal lands and at Federal buildings and associated facilities. This includes identifying regulatory requirements and evaluating compliance; completing storm water management plans; providing input for the District's long-term CSO control plan; and implementing new storm water controls.

◆ Focus Federal financial support and other assistance on wet weather pollution prevention and control priorities; and

◆ Participate in a Federal workgroup to facilitate communication and provide leadership.

3. Federal Agencies' Chesapeake Ecosystem Unified Plan, signed November 5, 1998

This agreement assigns specific tasks to the Federal agencies that signed. GSA's commitments include:

◆ Develop model lease provisions by September 30, 1999 for facilities, outleases, rights-of way, and other Federal actions to provide a means for Chesapeake Bay stewardship goals to be considered in the issuance of leases by or to Federal agencies within the watershed.

◆ Encourage construction design that: a) minimizes natural area loss on new and rehabilitated Federal facilities; b) adopts low impact development and best management technologies for storm water, sediment and erosion control, and reduces impervious surfaces; c) utilizes energy efficient technologies; and d) considers the Conservation landscaping and Bayscapes Guide for Federal Land Managers.

Activities Performed by NEPA Call-In to Date

1. Meetings

NEPA Call-In has arranged and participated in several meetings with

key GSA NCR personnel since September 9, 1998. The purpose of the meetings was to define short and long-term program objectives and to develop strategies to accomplish the objectives. NEPA Call-In also arranged for a January 13, 1999 meeting between key GSA NCR personnel and the EPA Region 3 Representative to the District of Columbia for storm water management.

Through these meetings, NEPA Call-In has facilitated the identification of an overall strategy to comply with initial steps of the above commitments, especially Section C of the CSO Special Panel Recommendations. The strategy includes:

- Researching applicable Federal and State storm water regulations and determine what GSA is obligated to do;
- Assessing GSA's compliance with these obligations;
- Assigning priority to facilities not in compliance with current storm water regulations and take corrective action;
- Developing a system to make storm water pollution prevention plans or other storm water assessments available to all GSA facilities in the program area, whether required by storm water regulations or not;
- Extending expertise gained into other regions of GSA.

NEPA Call-In also attended a November 17-18 Federal Storm

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Interview With A GSA NEPA Practitioner

In this and future issues of the NEPA Call-In Update Newsletter, we will be conducting interviews with expert NEPA and other environmental points of contact. We were fortunate to have Ms. Donna Meyer of Region 5 agree to the first interview. Donna's vast environmental experience and expertise, combined with her planned departure from GSA for a position with the Federal Aviation Administration, make her the perfect candidate to kick off our interview series.

Name: Donna M. Meyer

Job Title: Community Planner

Region: Property Disposal Division -
Midwest Branch, located in Region 5

Donna came to GSA by way of 10 years active duty as a weather forecaster with the United States Navy (USN) and two years as a Public Service Forecaster with the National Weather Service. She entered a GSA intern program as a GS-5 in 1987. After finishing the intern program Donna left GSA to work in the Regulatory Branch of the U.S. Army Corps of Engineers as a Wetlands Permit Manager for two years. She was later offered the opportunity to build an environmental program for the Public Buildings Service in Region 10 in 1993. Donna was in charge of the Region 10 environmental program until 1997, when she moved to Property Disposal. Donna will soon be leaving GSA for the Federal Aviation Administration as an Environmental Program Manager in the Airports Operations Division, Atlanta, Georgia.

How long have you been involved in environmental issues?

On a personal level, since I was about 16. I became interested in recycling and trying to stress its importance to my family. They are all pretty good recyclers now! Professionally, since 1983 during my time with the USN. For a short time, I was the ADMIN/Supply Petty Officer and was responsible for filing of all USN Orders and regulations and ordering of supplies. While I was filing environmental regulations, I learned a lot about NEPA and other environmental laws and what the Navy was supposed to do to be in compliance. In addition, I was recognized for saving my command money by putting some recycling programs into place.

How did you get involved in environmental issues?

My interest grew while studying for my B.A. in Geography and Environmental Resource Management at San Diego State University. The program really made me think about how finite and precious the Earth's resources really are.

How did you get involved in NEPA?

On my first day at GSA as a GS-5 intern on the Planning Staff, now known as Portfolio Management, my team leader was describing that GSA was building a new Courthouse and Federal Building in the region. I asked her if we had completed our NEPA analysis and her reply was, "we don't have to do that because we're the Federal government!" I decided at that moment that it was imperative as the Planning Staff that we needed to do proper NEPA analysis since we were thinking about projects two years in advance of getting our funding. What better time, than at the beginning of the planning process?

Was NEPA compliance something you pursued absent a formal environmental position?

To my knowledge, there are no formal NEPA environmental positions in GSA. Most of us who handle NEPA compliance issues are not trained as Environmental Protection Specialists. We have some industrial hygienists and related positions that handle asbestos and lead paint, but they typically don't deal with NEPA or other "bugs" and "bunnies" environmental statutes. So yes, this was something I pursued on my own. With encouragement from the Planning Staff Director, I made it my mission to learn as much as possible during my internship to become an all-around environmental practitioner within PBS.

What have been the major changes in the way environmental/NEPA issues are handled at GSA since your employment?

I think PBS is getting better educated and realizing that this is something we have to do and that it takes time. The word is being spread that we need to look at our actions before we implement projects rather than after the project has been completed. In addition, we are beginning to pay stricter attention to other environmental laws such as the Endangered Species Act, Coastal Zone Management Act and National Historic Preservation Act and how PBS projects can impact resources protected by these laws. The other thing that has changed over time is there are now more of us "NEPA types" in PBS, which has been long over due. Though we are a small knit group, the birth of the EQAG [Environmental Quality Advisor Group] and NEPA Call-in have both been a giant leap and provide very positive steps towards achieving environmental compliance throughout our agency.

What lessons can you share in regards to NEPA and other environmental issues?

Although I probably alienated some within PBS due to my persistence and "nagging" for the need to do environmental compliance over the years, I can say it was all worth it. I felt it was my job to protect PBS from environmental liability as well

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as protect taxpayers' interests regarding environmental issues. The best lesson I can share is to begin the NEPA process early on in the life of the project and not at the end! The other thing is to not give up; sooner or later project managers will recognize your dedication and appreciate your effort to keep their project on schedule and within budget.

Do you remember a specific NEPA problem or specific NEPA successes you have been involved in?

Honestly, I cannot remember a specific NEPA problem. None of the NEPA projects I have managed have ever been challenged in court. Knock on wood! I have several successes. Of course, I have had my favorite projects such as the EA for the Ronald Reagan Presidential Library, which I prepared for the National Archives and Records Administration; the NEPA, Section 404 and Endangered Species compliance issues for the construction of the Pacific Highway Port of Entry in Washington state; the Law Enforcement Center in Portland; and the disposal of Governors Island in New York.

What are the benefits or downfalls of NEPA? Are there more pros or cons inherent in the NEPA process?

I believe the benefits of NEPA can allow Federal agencies (with the input from taxpayers) to thoroughly research, plan and design their actions to provide wise stewardship (beneficial use without degradation) and protection of our national resources. Of course, the downfall is that this doesn't always work and Federal agencies and environmental compliance are often pushed aside to accommodate political desires or economic issues. As a NEPA practitioner, I think there are more pros inherent in the NEPA process. I guess if I didn't think this, I wouldn't have made it my career ambition to assure its importance and implementation within PBS. I believe NEPA is designed to work effectively and efficiently when you follow the process rather

than always looking for ways around it or trying to manipulate it.

What would you do to enhance or streamline the NEPA process if you could? I

haven't had any real problems with the NEPA process. The thing that takes up the most amount of time is general lack of knowledge within PBS at all levels regarding NEPA, the need for compliance, and the procedures that must be followed to get through it.

--Donna M. Meyer

To enhance or streamline it, I think internal PBS training at all levels should be instituted. When I was a new GSA employee, environmental training wasn't even on the agenda.

Do you think NEPA is necessary in its current form?

I guess what I would like to see is some real "teeth" for protection of environmental values through better cumulative impact analyses, and stronger monitoring and enforcement programs by agencies for adopted mitigation measures.

What do you think the future of NEPA is?

I Don't think NEPA is going away. I once heard some rumblings from Dr. Lynton Caldwell (one of the author's of NEPA), during a NEPA course that I took at Duke University, that NEPA needs to be updated to reflect what we have learned over the last 30 years.

Will environmental issues ever "die" in the Federal government?

Simple answer, absolutely not! If anything, I think new ones are being "born" everyday.

Thank you, Donna, and best wishes at the FAA! We hope your continued presence on the PBS Environmental Quality Advisory Group (EQAG) will be supported by the FAA.

The E-Book Nears Completion from page 1

has completed Phase I of the "E-Book" and is beginning Phase II. Phase I consisted of gathering the data needed for our training project and Phase II will focus on site visits to regional/field offices to provide an overview of the "E-Book" and obtain feedback on the product.

With the help of Mr. Milburn Smith, Region 7, and Mr. Phil Youngberg, Region 4, NEPA Call-In is currently working with the EQAG to schedule pilot presentations in several regions and field offices. The presentations are intended to provide the regions with an overview of the "E-Book" and

provide regional staff an opportunity to participate in creating effective training for NEPA and NHPA compliance.

E-Book

**For more information,
contact NEPA Call-In
202-208-6228.**

Interesting Technical Inquiries (TIs)

TI 0415

Section 106 Consultation/ NEPA Guidance

NEPA Call-In recently fielded a request for guidance on implementing Section 106 of the National Historic Preservation Act (NHPA) for a proposed action potentially adversely affecting a property eligible for or listed on the National Register of Historic Places (National Register). The caller stated they have been involved in the consultation process under Section 106 of the NHPA for the potentially historic property as part of an environmental impact statement (EIS) being prepared under the National Environmental Policy Act (NEPA). In the EIS the preferred alternative for the proposed action of acquiring a new courthouse would involve demolishing the potentially historic structure with mitigating its loss through conducting a Historic American Buildings Survey (HABS). HABS documentation is often used to provide the basis for enforcing preservation easement. In addition, HABS documentation is often the last means of preservation of a property, when a property is to be demolished, and provides future researchers access to valuable information that otherwise would be lost. The HABS would be conducted according to the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. The caller developed a Memorandum of Agreement (MOA), signed by the State Historic Preservation Officer (SHPO), discussing mitigation in the form of a HABS. The caller sent the MOA to the Advisory Council on Historic Preservation (Council) to be signed. However, some local controversy exists over the current preferred alternative and the Council is hesitant to sign the MOA in light of the controversy. The caller wanted to know if GSA must wait for

the Section 106 process to be concluded in order to issue the Record of Decision (ROD), and wanted to know what conditions constitute conclusion of the Section 106 process. NEPA Call-In's answer to the inquiry follows:

SUMMARY OF FINDINGS

Issuing a ROD on the proposed action before the Section 106 process has been formally concluded would be in violation of the NHPA. After an MOA has been signed by the SHPO, it should be forwarded to the Council with documentation specifically requesting a review. The Council may accept the MOA as is, make changes to the MOA which must be agreed upon by the agency and SHPO, or provide direct comment on the MOA. The Section 106 process is not completed until either: 1) the Agency, Council and SHPO agree on the MOA, or 2) the Council provides direct comments to the Agency Official and the Agency Official considers these comments in reaching a final decision. The Agency Official must report the decision directly to the Council, which concludes the Section 106 process in this case. NEPA Call-In's detailed findings are provided below.

DETAILED FINDINGS

NEPA Call-In first reviewed Section 106 guidance on the Council's world wide web site located at (<http://www.achp.gov>). We reviewed the document titled, "Step-by-Step," which is intended to guide applicants through the Section 106 process and explain the Section 106 regulations located in Title 36 Code of Federal Regulations (CFR) Part 800. The section of this document on the MOA provides specific guidance related to your inquiry. This section states the MOA is the product of consultation with various parties and that the MOA specifies how the undertaking will be carried out in order to avoid or mitigate adverse effects, or documents acceptance of such effects. The MOA is a legally binding document.

According to the Council guidance, when the Council is not a consulting party, the MOA is signed by the agency and SHPO and is then submitted to the Council specifically requesting a review. If the Council reviews and accepts the MOA as submitted, its acceptance serves as the Council's comments and concludes the Section 106 process. If the Council does not accept the submitted MOA, the following two scenarios may occur:

1. Within 30 days after it receives the MOA and accompanying documentation, the Council advises the agency of changes to the MOA that would make it acceptable to the Council. If the agency, SHPO, and Council reach agreement on alternative changes, the modified MOA will be accepted by the Council, concluding the Section 106 process. If the agency, SHPO, and Council cannot agree on changes, the agency official must notify the Council of the disagreement. The Council is to provide written comment to the agency within 30 days of receiving this notice. According to 36 CFR Part 800.6(c)(2), "Response to Council Comment," the Agency Official shall "consider the Council's comments in reaching a final decision on the proposed undertaking. The Agency Official shall report the decision to the Council and, if possible, should do so prior to initiating the undertaking." This would conclude the Section 106 process in this scenario.

2. Within 30 days after if receives the MOA and accompanying documentation, the Council advises the agency that it has decided to comment directly on the undertaking rather than accepting or seeking to modify the agreement. Unless the agency agrees to a longer time period, the Council issues written comments within 60 days after it receives the complete MOA submission. The Agency should respond to Council comments

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following 36 CFR Part 800.6(c)(2) as cited above.

We then contacted an Expert Advisor; Cultural, Environmental, and Accessibility Program; GSA National Office, to inquire about the Section 106 process as it relates to your inquiry. The Expert Advisor stated a ROD on the proposed action cannot be issued until a formal conclusion to the Section 106 process has been reached and that issuing a ROD before concluding the Section 106 process would be in violation of the NHPA.

TI 0416

Time Requirement Between Notice Of Public Scoping Meeting and When the Meeting is Held

NEPA Call-In fielded a request for information about the time requirement (minimum number of days) between the time GSA publishes a notification that a public scoping meeting will be held and the date the meeting is held. The caller stated that GSA has already published a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) and wanted to publish a notice in the local newspaper to advertise a scoping meeting for the EIS. NEPA Call-In's response follows:

SUMMARY OF FINDINGS

NEPA Call-In determined that there is no specific time requirement (minimum number of days) between the time GSA publishes a notification that a public scoping meeting will be held and the date the meeting is held. The regulations stipulate that GSA must provide public notice of NEPA-related public meetings but leaves the notification method to the discretion of the Federal agency. Therefore, it is left to your discretion as to how many days prior to the public meeting the announcement should be published as long as the public is made aware of the meeting and is given an opportunity to attend. NEPA Call-In's detailed findings

are provided below.

DETAILED FINDINGS

NEPA Call-In first reviewed the Council on Environmental Quality (CEQ) regulations on implementing the National Environmental Policy Act (NEPA) contained in Title 40 Code of Federal Regulations (CFR) Part 1500. Part 1501.7, "Scoping," discusses the purpose and need for an open scoping process but does not stipulate a time requirement for notification prior to a public scoping meeting. Part 1506.6, "Public Involvement," paragraph (b) states: "Provide public notice of NEPA-related hearings, public meetings, and the availability of environmental documents so as to inform those persons and agencies who may be interested or affected." Part 1506.6 also provides several recommended methods for notifying the public of the meeting. However, the regulations do not include a time requirement for notification prior to a public scoping meeting.

Part 1501.8, "Time limits," states that Federal agencies are encouraged to set time limits for the NEPA process, but also does not stipulate a time requirement for notification prior to a public scoping meeting.

NEPA Call-In then reviewed the CEQ document, "Forty Most Frequently Asked Questions Concerning the CEQ's NEPA Regulations," but found no information pertinent to your question.

NEPA Call-In also reviewed the CEQ's April 30, 1981 "Memorandum For General Counsels, NEPA Liaisons, and Participants in Scoping." The guidance provides no specific requirement or guidance for number of days. Rather, the document states:

"Because the concept of open scoping was new, the Council decided to encourage agencies' innovation without unduly restrictive guidance. Thus the regulations relating to scoping are very simple. They state that "there shall be an early and open process for determining the scope of issues to be addressed" which "shall be

termed scoping," but they lay down few specific requirements. (Section 1501.7). They require an open process with public notice; identification of significant and insignificant issues; allocation of EIS preparation assignments; identification of related analysis requirements in order to avoid duplication of work; and the planning of a schedule for EIS preparation that meshes with the agency's decisionmaking schedule. (Section 1501.7(a)). The regulations encourage, but do not require, setting time and page limits for the EIS, and holding scoping meetings. (Section 1501.7(b)). Aside from these general outlines, the regulations left the agencies on their own. The Council did not believe, and still does not, that it is necessary or appropriate to dictate the specific manner in which over 100 federal agencies should deal with the public."

NEPA Call-In then reviewed the PBS NEPA Desk Guide, Chapter 4, "Scoping and Planning for Public Involvement," and Chapter 7, "Environmental Impact Statements." Neither chapter stipulates a time requirement for notification prior to a public scoping meeting. Appendix 2, "NEPA Time Frames," states that the time limit for a notice to be placed in a newspaper prior to holding a public meeting is usually 15 days. However, the citation refers to the requirements of Title 40 CFR Part 1506.6, discussed above.

Finally, NEPA Call-In reviewed the NEPA Call-In factsheet, "Public Participation Under NEPA." This publication discusses the importance of involving the public in the NEPA decision process and provides guidance for methods of involving the public. However, it does not make any specific information pertinent to your question.

Therefore, it appears that there is no specific time requirement (minimum number of days) between the time GSA publishes a notification that a public scoping meeting will be held and the date the meeting is held. The regulations stipulate that GSA must provide public

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notice of NEPA-related public meetings “so as to inform those persons and agencies who may be interested or affected,” but leaves the notification method to the discretion of the Federal agency. Therefore, it is left to your discretion as to how many days prior to the public meeting the announcement should be published as long as the public is made aware of the meeting and

is given an opportunity to attend. In addition, you may want to consider additional methods of public notification, such as mailing informal invitation letters to local elected officials, local community or civic groups, neighborhood associations, and local environmental groups which may have an interest in the proposed action.

NCR Tackles Storm Water Management continued from page 3

Water Management Workshop hosted by the Army Environmental Center in Edgewood, Maryland in order to learn more about current and future Federal storm water management issues.

2. Technical Research

NEPA Call-In conducts ongoing research of Federal and State storm water permitting regulations and presents the results in understandable language to GSA's NCR representatives. NEPA Call-In has also identified guidance on the National Pollutant Discharge Elimination System (NPDES) regulations and guidance for preparing individual storm water pollution prevention plans and presented this information to GSA's NCR representatives.

NEPA Call-In's factsheet, “Storm Water Pollution

Prevention,” November 1998, was used as handout material at a Federal agency storm water workgroup facilitated by the EPA Region 3 Representative to the District of Columbia for storm water management.

A future NEPA Call-In factsheet, “Implementing a Storm Water Management Program,” will provide practical guidance for voluntary storm water management programs by pulling together research and information acquired through assisting in NCR's efforts. The factsheet will explain Federal storm water regulations, including clarification of what types of facilities are currently required to be in compliance with an NPDES permit for storm water. The factsheet will also demystify storm water pollution prevention plans, which are the main tool used to comply with NPDES permits.

*NEPA Call-In is designed to meet the NEPA
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GSA's realty professionals.*

NEPA Call-In Update

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Need more information

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